

DUST & EMISSIONS MANAGEMENT PLAN

Brunel Road Industrial Estate, Newton Abbot, TQ12 4PJ

Teignbridge District Council

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1 Introduction

1.1 General

- 1.1.1 Oaktree Environmental Ltd have been instructed by (the Operator) to prepare this Dust & Emissions Management Plan (DEMP).
- 1.1.2 This DEMP assesses the risk of dust associated with the storage and treatment of waste at Brunel Road Industrial Estate, Newton Abbot, TQ12 4PJ and provides mitigation and control measures implemented in relation to dust from waste operations undertaken at the site.
- 1.1.3 The permit boundary is illustrated in green on the Permit Boundary Plan held in Appendix I. All reference to 'the site' in this DEMP refers to the associated operations, infrastructure, plant, and equipment within this boundary.
- 1.1.4 The site is currently operating under a waste exemption license registration number WEX399000 with series of exemptions which include an S1, S2 and T4 exemption. The reason for the new bespoke permit application and therefore the reason for undertaking this Dust Management Plan is allow the site to operate under an Environmental permit (EP) and discount the need for the exemptions.
- 1.1.5 The site will be applying for and operating in accordance with a bespoke permit application : The following treatment activities/operations are undertaken on the site:
- Sorting (with loading shovel/Manitou or by hand)
 - Separation (by using appropriate mechanical plant and equipment)
 - Baling (by using appropriate mechanical plant and equipment)
 - Compacting (by using appropriate mechanical plant and equipment)

1.2 Content of the Dust & Emissions Management Plan

- 1.2.1 This DEMP provides detailed information on the sources, risks, and mitigation measures relating to the potential of dust emissions from operations undertaken on site. This DEMP has been prepared in accordance with Environment Agency guidance “Control and monitor emissions for your environmental permit” last updated 24 November 2022.
- 1.2.2 This DEMP will allow the Operator to implement an action plan should the site operatives detect the presence of airborne dust escaping beyond the site boundary, receive complaints from receptors.
- 1.2.3 In addition to this DEMP the site is managed and operated in accordance with a fully comprehensive Environmental Management System (EMS).

1.3 Responsibility for Implementation of the DEMP

- 1.3.1 Ultimately the site manager is responsible for the implementation of the DEMP and for ensuring the mitigation strategies outlined in this DEMP are in place and adhered to. Where the site manager is unavailable to oversee the implementation of dust suppression and mitigation strategies, a suitably experienced site operative or the Technically Competent Manager (TCM) is delegated responsible.
- 1.3.2 All staff members have received the necessary training to deliver dust suppression measures and understand the contents and requirements detailed within this DEMP. Staff will undergo refresher training every 12 months or in the event of a dust complaint / issue or the implementation operational changes.

1.4 Reviewing and monitoring this DEMP

- 1.4.1 This DEMP will be reviewed by the site manager on a biannual basis (every two years) or when a change in operation is deemed to have a potential effect on increasing dust emissions which could include any of the following:
- a) Changes to operations (additional treatment activities).
 - b) Following a report or incident of dust emissions leaving the permit boundary.

1.5 Relevant Legislation

Air Quality Management Area (AQMA)

- 1.5.1 The system of local air quality management (LAQM) was introduced under the Environment Act 1995. LAQM requires local authorities to periodically review and assess the current and future quality of air in their areas. Where it is determined that an air quality objective is not likely to be met within the relevant time period, the authority must designate an AQMA.
- 1.5.2 The site is not located within an AQMA.

Low Emission Zone (LEZ)

- 1.5.3 A LEZ is an area that has restrictions on the type and age of vehicles permitted in it, this prevents high level of pollution emitting vehicles from entering and operating within the zone with the aim of improving air quality. High polluting vehicles are required to pay a charge to enter the zone.
- 1.5.4 The site is not located within a low emission zone.

1.6 Hours of Operation

- 1.6.1 The site will be open during the following hours for the delivery, receipt, and processing of waste:

Monday to Friday	06:00 – 17:00
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Saturday	06:00 – 16:30
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Sundays, Bank/Public holidays	Closed
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- 1.6.2 The only activities on site which will be permitted outside of these hours are onsite maintenance works, emergency deliveries of waste/plant/machinery and general office use.

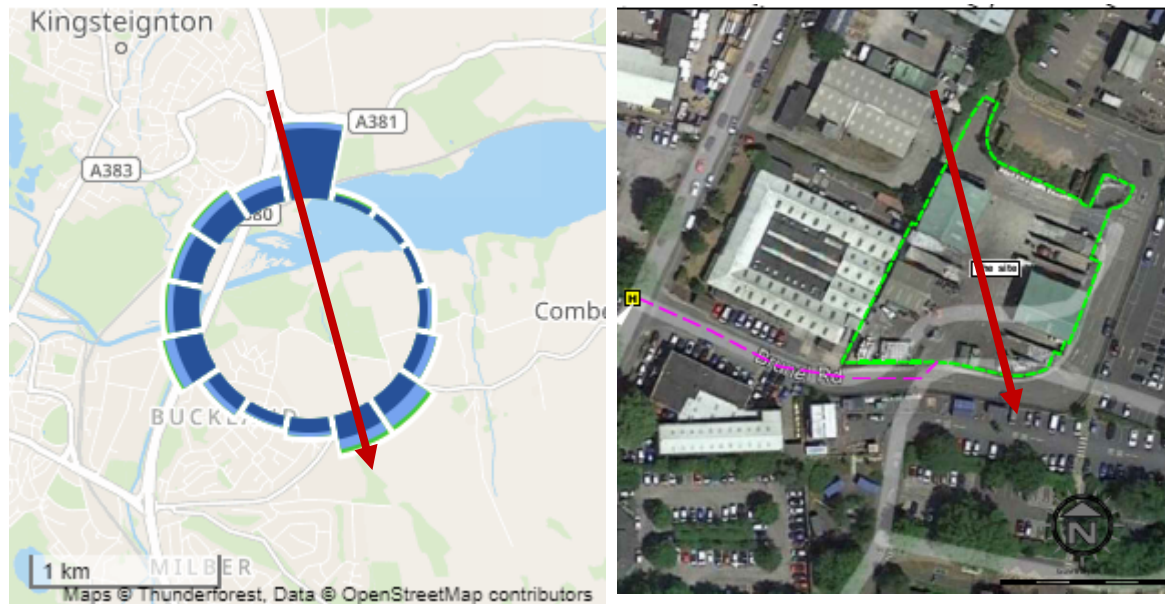
- 1.6.3 During times where the site is closed or not in operation, the site will be locked and secured to prevent unauthorised access.

2 Sensitive Receptors

2.1 Meteorology

- 2.1.1 Unlike many other atmospheric pollutants, the generation of dust is particularly dependent upon weather conditions.
- 2.1.2 The prevailing meteorological conditions at any site will be dependent upon many factors, including its location in relation to macroclimatic conditions as well as more site-specific microclimatic conditions. The most significant meteorological factor is the predominant wind direction and speed.
- 2.1.3 Wind speed and direction data have been obtained from Newton Abbot weather station for the period for the period of 05/2013- 02/2017, shown in Figure 1 below. This weather station is approximately 1.24km away from the site's boundary. The red arrow on the below figure illustrates the predominant wind direction.

Figure 2.1 – Wind rose from Newton Abbot weather station



- 2.1.4 In accordance with the wind rose data in Figure 2.1 above, the predominant wind direction blows towards the southeast of the site. Receptors with the highest sensitivity to dust within close proximity to the site are considered to be the commercial situated south on Brunel Road Industrial Estate off Brunel Road. Also, the wind direction means that the A381 road network is also potentially impacted from dust should this arise. A full list of sensitive

receptors within 1km of the site that are considered would be impacted by the impact of dust emitting beyond the permit boundary are shown in Table 1 overleaf.

2.2 Receptors

- 2.2.1 A Receptor Plan has been prepared to illustrate the location of all receptors within 1km of the site, see Appendix I, Drawing No. 3312/001/04 Receptor Plan. As mentioned above the predominant wind direction is towards the southeast, therefore, receptors listed below that are south of the site are most likely to be impacted if dust emissions were to escape beyond the site boundary.
- 2.2.2 Receptors will have a varying sensitivity to dust depending on the receptor type. It is considered human receptors will have the highest sensitivity to dust, this will include receptors within close proximity to the site where people will spend significant amounts of time i.e. residential dwellings, hospitals, schools and care homes.
- 2.2.3 Table 1 overleaf details the direction and distance from the boundary of the site to the boundary of receptors within 1km of the site.

Table 1 - Sensitive Receptors

Receptor	Direction from Site	Approx distance from the site boundary to the receptor boundary (m)
Commercial / Industrial		
Drake Tooling & Abrasives Ltd	West	0
Dulex Decorator Centre	North West	10
Axiom Veterinary Laboratories Ltd	South west	40
Bupa Dental Care	South west	82
Visit South Devon	South	100
Residential		
Residential property (Queensway)	East	265
Residential property (Torquay Road)	South	360
Residential Property (Forde Close)	West	180
Schools		
Abbotsbury School	Southwest	420
All Saints Marsh Primary School	Northwest	660
Haytor View Community School and Nursery	East	430
Watercourses		
Aller Brook	East	65
River Teign	North	620
Infrastructure (major roads and transport links)		
A381	East	95
Torquay Road	South	295
Brunel Road	Running through the site	0
Ecological Sites		
Aller Brook (Local Nature Reserve)	East	65

2.3 Other Dust and Emission Sources

- 2.3.1 It is considered there will be a natural production of dust from surrounding Industries. In particular the 'Bradford's' which is a building material supply business. Dust generated from the machining of materials or generated from the adjacent premises from vehicle

movements. It is considered that the site will not generate amounts of dust in comparison the to surrounding business due to the waste types that are accepted at the site.

- 2.3.2 Surrounding roads have the potential to produce dust from vehicles and maintenance issues i.e. potholes. For example, the A381 road network which is approximately 95m east of the sites boundary.

3 Site Operations

3.1 Waste Deliveries & Acceptance

- 3.1.1 Strict Waste acceptance procedures will be implemented on site to ensure that only suitable waste is accepted. Only those waste codes detailed in the Environmental Permit will be accepted onto the site. Waste acceptance procedures will ensure that waste will not comprise solely or mainly of dust, powders, or loose fibres.
- 3.1.2 Waste will be delivered onto / depart from site primarily by the Operators own vehicles (skip lorries). The movement of vehicles on site has the potential to cause dust emissions, particularly in dry and windy conditions. A 5mph speed limit and the minimisation of vehicle movements will be enforced on site to reduce the amount of dust generated by vehicle wheels.
- 3.1.3 All vehicles entering / exiting the site will be sheeted to minimise the likelihood of dust emissions. Loaded vehicles that are not sheeted will not be allowed to enter the site. Vehicles delivering waste will predominantly comprise skip wagons collected from householders or commercial premises.
- 3.1.4 Any third-party deliveries to the site will be advised that all loads must be suitably sheeted.
- 3.1.5 Vehicles entering the site will be visually inspected prior to unloading to ensure that loads comprising solely dust, powders, or loose fibres are not accepted.

3.2 Potential Dust Emissions

Waste Codes

- 3.2.1 Table 2 below details all of the EWC codes that will be accepted at the site in accordance with the permit. The waste codes highlighted in red are likely to give rise to emission through windblown litter.

Table 2 - Wastes with Dust Potential

EUROPEAN WASTE CATALOGUE - COMMISSION DECISION 2000/532/EC	
WASTE CODE	DESCRIPTION
15	Waste packaging; absorbents, wiping cloths, filter materials and protective clothing not otherwise specified
15 01	Packaging (including separately collected municipal packaging waste)
15 01 01	Paper and cardboard packaging
17 01 02	Plastic packaging
15 01 04	Metallic packaging
15 01 05	Composite packaging
15 01 06	Mixed packaging
15 01 07	Glass packaging
20	Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions
20 01	separately collected fractions (except 15 01)
20 01 01	paper and cardboard
20 01 02	soil and stones
20 01 08	food waste
20 01 10	clothes
20 01 11	textiles
20 01 39	plastics
20 01 40	metals
20 03 01	mixed municipal waste

- 3.2.2 Reference should be made to the Risk Assessment Tables outlined in Section 5.7 and the control measures outlined in Section 4 for details of the handling procedures and mitigation measures in place for wastes stored and treated on site.

3.3 Waste Storage Table

- 3.3.1 Table 3 details the location, waste types and duration of all wastes actually stored on site. The waste types with dust/litter potential have been highlighted in red.
- 3.3.2 All waste stored in bays will be stored with a minimum 1m freeboard from the maximum height of the bay wall.

Table 3 - Waste Storage Table

Storage Area Details (PILE BASED ON AREA X H NOT L X W X H)													
Plan Ref	Description	Storage type	Containment / type	Height / width of firewall (m)	Max width (m)	Max length (m)	Max height (m)	Max area (m)	Conversion factor used	Max volume (m3)	Approx. tonnage	Max storage time	Comments
Bay 1 (Glass)	Holding and bulking bay for pre-segregated and sorted glass	Sorted, not mechanically processed	Free-standing / three-sided solid a-block concrete fire wall	3.5 / 0.2	5	13	3	65	0.75	122	41	<72 hours	Bay emptied sooner if full.
Bay 2 (Glass or Mixed Recyclables)	Holding and bulking bay for pre-segregated and sorted glass	Sorted, not mechanically processed	Same as above	3.5 / 0.2	5	15.9	3	70	0.75	191	58	<72 hours	Bay emptied sooner if full.
Bay 3 (Baled Recyclables)	Storage area for baled plastic, cans or card (contents may vary)	Sorted and baled	Same as above	4 / 0.2	4	15.9	3	56	1	191	191	<72 hours	Bale stacks are stored four high in bunker. Bay emptied sooner if full.
Bay 4 (Cardboard)	Baler infeed bay comprising sorted cardboard	Unprocessed	Free-standing / mixture of three-sided concrete panel and galvanised steel fire wall	4 / 0.3	5	4	3	20	0.75	45	15	<12 hours	Stockpile cleared 30 minutes before site shutdown.
Bay 5 (Cardboard outfeed)	Baler outfeed (baled cardboard)	Processed (baled)	Free-standing bale stack / mixture of three-sided concrete panel and galvanised steel fire wall	4 / 0.3	1.2	14	1.2	16.8	1	20	20	<12 hours	Bale stacks cleared 30 minutes before site shutdown.
Bay 6 (Baled Recyclables)	Storage area for baled plastic, cans or card (contents may vary)	Sorted and baled	Free-standing bale stack / three-sided solid a-block concrete fire wall	4 / 0.2	4	12	3	48	1	144	144	<72 hours	Bale stacks are stored two high in blocks of three. Bay emptied sooner if full.
Bay 7 (Loose plastic)	Holding and bulking bay for pre-segregated and sorted plastic	Unprocessed	Same as above	4	5	10.2	3	51	0.75	153	50	<72 hours	Bay emptied sooner if full.
Bay 8 (Mixed plastic & cans)	Holding and bulking bay for a mixture of plastic and cans	Sorted, not mechanically processed	Same as above	4 / 0.2	5	14	3	70	0.75	158	53	<72 hours	Bay emptied sooner if full.
Bay 9 (Mixed plastic & cans)	Holding and bulking bay for a mixture of plastic and cans	Sorted, not mechanically processed	Free-standing / two-sided solid concrete fire wall	4 / 0.2	5	14	3	70	0.75	158	53	<72 hours	Bay emptied sooner if full.
Bay 10 (Loose paper and cardboard)	Holding and bulking bay for pre-segregated and sorted paper and cardboard	Sorted, not mechanically processed	Free-standing / three-sided solid a-block concrete fire wall	4 / 0.2	15	7.5	3	72.5	0.75	163	54	<72 hours	Bay emptied sooner if full.
Area 11 (Baled recyclables)	Storage area for baled plastic, cans or card (contents may vary)	Sorted and baled	Free-standing bale stack / partly contained with concrete a-block fire wall to the west	4 / 0.2	3	8	3	24	1	72	72	<1 week	Bale stacks are stored four high. Bay emptied sooner if full.
Area 12 (Baled Recyclables)	Storage area for baled plastic, cans or card (contents may vary)	Sorted and baled	Free-standing bale stack / partly contained with concrete a-block fire wall to the west	4 / 0.2	3	8	3	24	1	72	72	<1 week	Bale stacks are stored four high. Bay emptied sooner if full.
Area 13 (Baled Recyclables)	Storage area for baled plastic, cans or card (contents may vary)	Sorted and baled	Free-standing bale stack / partly contained with concrete a-block fire wall to the west and south	4 / 0.2	3	8	3	24	1	72	72	<1 week	Bale stacks are stored four high. Bay emptied sooner if full.

Storage Area Details (PILE BASED ON AREA X H NOT L X W X H)													
Plan Ref	Description	Storage type	Containment / type	Height / width of firewall (m)	Max width (m)	Max length (m)	Max height (m)	Max area (m)	Conversion factor used	Max volume (m3)	Approx. tonnage	Max storage time	Comments
Area 14 (Food waste skips)	Sealed containers/skips of food waste	Unprocessed	Fully sealed 40-cubic yard skip	N/A	2.5	6.1	2.62	15.25	1	40	13	<1 week	Volume based on each skip. Skip removed sooner if full. The skip is fully sealed unless being filled from the top. Empty container placed in same location once removed.
AREA 15 (Battery store)	Non-hazardous batteries	Unprocessed	Containers with weatherproof covering	N/A	1.2	1	0.65	1.2	1	1	1	<1 week	Containers removed and replenished once full. Volume based on each container (approx. 5 - 10)

3.4 Free Standing piles/ waste stored in bays

- 3.4.1 Table 4 below details the combustible waste piles stored on site which are free-standing or in bays including a summary of procedures to reduce the risk of the waste combusting.

Table 4 - Storage/monitoring procedures- free-standing piles

Pile Ref:	Storage/monitoring procedures to reduce the risk of fire
AREAS/BAYS 2, 4, 7, 8, 9 and 10 Waste bulking areas for unprocessed wastes comprising paper & card, plastic, glass and cans	• These areas comprise bulking bays for waste deliveries. • The waste is emptied by the vehicle at the front of the stockpile, this then undergoes an initial inspection to check for any non-conforming waste. • In the event of non-conforming or reactive waste discovered, the item or waste (if contaminated) will be immediately consigned to the quarantine area using mobile plant or loaded back onto the delivery vehicle and removed off site. • The waste in the stockpile will be tipped at the front of the pile and transferred to the rear of the pile using mobile plant ensuring the first in first out principle applies to the waste. • Stock rotation – It is proposed the maximum duration of waste stored in these areas here will be 78 hours i.e. Fri (pm) -Mon (am) if the waste cannot be removed on Friday evening. • In order to comply fully with the FPP guidance, each bay will undergo a deep clean every 12 weeks to prevent any build-up of material. Bays would not be all cleaned at the same time, each bay would be noted when the clean took place and recorded in the site diary to ensure staff can monitor which bay requires cleaning. • As the stockpiles are dynamic, the process of tipping and excavating from the pile will be ongoing which will reduce the actual amount of time the piles will be stored prior to processing. • The piles are all very easily accessible for firefighting purposes. • The piles will be visually monitored continuously throughout the day by trained site operatives. The operatives have been trained via toolbox talks from site management in recognition of fire i.e. the early signs. • In terms of Bays 4 and 10, due to the high combustibility of the waste stored (paper and card), smoke sensors are fitted internally (Bay 10) and infra-red (heat) detection cameras in Bay 4. All cameras are capable of monitoring where all the waste is stored ensuring no blind spots are present. • For stockpiles which do not benefit from heat or smoke detection, there is CCTV (intruder alert) located near the pile and the lasers (when activated before site closure) would detect signs of smoke or movement when the site is closed. Also, as the waste will not be stored for a period of >72 hours, the risk of self-combustion is extremely low. • There is full access to the piles for firefighting as all buildings storing waste have large access points ensuring suppression to the full pile without having to enter the building. • No further storage or monitoring procedures required.

3.5 Baled Waste storage

- 3.5.1 Table 5 overleaf details the procedures for managing baled waste storage on site.

Table 5 - Waste storage table for waste stored in bales

Pile Reference	Storage/monitoring procedures to reduce the risk of fire
AREAS/BAYS 3, 5, 6, 11, 12 and 13 Baled recyclables comprising mainly cardboard and cans	• The bales will be stored a maximum of three – four bales high. • The bales are visually monitored throughout the day by site operatives and trained personnel who will be trained via toolbox talks in recognition of fire. • Apart from the use of loading equipment (the location of which varies throughout the building) no mechanical processing of waste takes place within 6m of waste piles. • AREA 5 comprises a transient storage area which will be cleared before the site shuts down. • All internal bales are accessible for firefighting as detailed in Table 4.2. • It is considered that no turning of bales is necessary as they will not be stored for longer than 1 week and will be monitored using the techniques below. • In the event the bales need to be stored longer, further monitoring of the bales may be used using a probe or thermal imagery. If this method is used, the centre bale stacks will be removed meaning the operator can provide a full representation of the bale surface temperature and inside the centre of the bales. • If the operator did monitor using the above method, if a temperature of above 70°C is recorded, the bale will be transferred into the quarantine area, broken and doused with water until the temperature has reduced. The other bales will then be re-assessed using the same monitoring techniques. • Reference should also be made to Table 4.2 in terms of other procedures not listed in this table. • No further storage or monitoring procedures required.

3.6 Waste stored in containers

3.6.1 Table 6 overleaf details the waste types which are stored in containers at the site.

Table 6 - Waste storage table for wases stored in containers.

Pile Ref:	Storage/monitoring procedures to reduce the risk of fire
AREAS 14, & 15 Food waste and non-hazardous batteries	- AREA 14 will store pre-separated food waste in a number of skips prior to being removed off site. - In terms of AREA 15, this area comprises a sealed container where batteries are placed by hand into dedicated battery containers benefitting from an acid-resistant base. The operator will not mix any batteries containing differing chemistries. - All containers are stored on the ground and replaced by empty containers once full and removed off site. - The waste in the food containers arrives in RCVs which contain separate 'cassettes' of pre-segregated food waste so unlikely to contain any hot loads or incompatible waste which could lead to a spark or overheating causing a fire. - The containers will be removed from site within a week or sooner if full. - The containers are accessible from at least on side and from the top in the event of a fire occurring in the container to allow access for firefighting. - The waste cannot exceed the height of the container as the containers are fully enclosed. - In the highly unlikely event of a fire breaking out in a container, it can be dragged into the quarantine area by mobile plant to reduce the spread i.e. to adjacent waste piles or processing plant. - In terms of other monitoring, see above piles so it is considered no further monitoring procedures are required.

3.7 Mobile Plant and Equipment

3.7.1 Table 7 details the plant / equipment available on site. Only trained operators will be permitted to drive / operate the plant / equipment listed below. Any changes to the list may require an update to this document.

Table 7 - Plant & Equipment

Item	Number	Function
Telehandler (mobile plant)	1	Movement/sorting of waste
Loading shovel (mobile plant)	1	Movement/sorting of waste
Forklift truck (mobile plant)	2	Movement/sorting of waste
Baler (fixed plant)	2	Compaction/processing of waste
Picking line (fixed plant)	1	Hand sorting of waste

3.7.2 The plant/equipment on site may vary and additional equipment may be hired-in to cope with busy periods, larger jobs or jobs with specific requirements.

- 3.7.3 All plant and equipment used on site will be subject to preventative maintenance checks to ensure effectiveness and no excess smoke from exhausts is being produced.
- 3.7.4 A no idling policy is in place which ensures that engines are switched off when vehicles or plant are not in use. This policy will ensure that tail pipe emissions are significantly reduced.

4 Dust Management & Mitigation

4.1 Sources of Fugitive Dust / Emissions

4.1.1 The main dust/litter emission sources which arise from site are detailed in Table 8 below:

Table 8 – Dust/litter emission source table

Source/Plan Ref	Description
Bay 7- Loose Plastics bay	Tipping are for incoming plastics
Bay 4- Carboard and baler feed pile	Bay for the feeder pile for the carboard baler.
Bays 8 and 9- Mixed plastics & cans	Storage for the incoming mixed plastics and cans
Various sources	Vehicles accessing/egressing the site tracking dust on to or off the site
Various sources (sorted waste bays)	Loading waste materials on to vehicles for removal off site
Various sources	Particulate emissions from the exhaust of vehicles/plant/machinery on site (NO2).
Various sources	Where wind speed reaches 4+ on the Beaufort Wind Scale.

4.2 Control Measures (general/staff training/daily inspections)

4.2.1 Good housekeeping and site practices are vital to ensure that the impacts from fugitive dust/litter/emissions and debris impacts are controlled.

4.2.2 Daily inspections are undertaken on site in relation to the presence of dust / debris with corrective actions implemented upon discovery. Operational staff are suitably trained in procedures to keep the levels of dust /debris to a minimum including prevention and mitigation.

4.2.3 In dry and windy weather conditions recorded inspections will take place more frequently (up to three times a day). All inspections are visual and recorded on the Inspection Checklist, see Appendix II.

- 4.2.4 Areas where litter are likely to arise or build up will be continuously monitored throughout the working day and cleaned on a daily basis; paying special attention to plant and equipment where dust is more likely to build up.
- 4.2.5 The weather conditions at the site will be considered and recorded at the start of each working day so that the days operations may be planned to consider any potential increase in emissions from climatic conditions. If wind conditions between 4-6 on the Beaufort Wind Scale are experienced the site manager will decide whether to implement more frequent visual monitoring i.e. three times daily or periodically (every hour) or if continuous suppression is required.
- 4.2.6 If excessive windy conditions are expected (winds exceeding 6 on the Beaufort Wind Scale) the site manager can decide if stockpile heights need reducing or if some treatment operations need to be temporarily suspended.

4.3 Control Measures (boundary fencing / containment)

- 4.3.1 Wastes with the highest potential to produce dust (soil, stones, hardcore etc) are stored in bays or freestanding stockpiles adjacent to a panelled wall or within the waste transfer building. All wastes are stored with a minimum 1m freeboard from the surrounding containment/walls.
- 4.3.2 Fencing surrounding the site boundary comprises of 3.5m in height palisade fencing for the majority of the fences surrounding the perimeter of the site. For all of the tipping and processing operations these will be conducted within the onsite buildings shown on Drawing No. 3312/001/03, which comprise of 3.5m in height concrete walls with additional steel sheeting.
- 4.3.3 The waste transfer buildings will provide containment for wastes stored within.

4.4 Control Measures – site surfacing

- 4.4.1 All waste storage and treatment areas comprise of impermeable concrete surfacing. The operator has the capability to dampen down surfaces and stockpiles using hosepipes and an 15,000-litre water storage tank or the onsite mains water supply.
- 4.4.2 Areas of impermeable concrete will be manually swept at the end of each working day to collect any litter / dust that has settled on the site surface to prevent it becoming windblown outside of operational hours.

4.5 Control Measures - vehicle movements

- 4.5.1 The control measures implemented by site management to minimise the risk of dust and debris emissions from dusty site surfaces and vehicle movements include:
- a) Access to a permanent mains water supply and an additional onsite water storage tank which will be available at all times, particularly during hot and dry weather conditions to ensure that the dust suppression systems can function effectively.
 - b) Vehicle speed on site is restricted to 5mph. Signs are erected at the relevant areas of the site. This reduces the potential for re-suspension of dust and particulate matter.
 - c) Exiting vehicles leaving the site will avoid all areas where wastes are stored or stockpiled. All vehicles will be checked before they leave the site to ensure no mud/dust can stretch beyond the site access. All incoming/outgoing vehicle loads will be sheeted.
 - d) If required hoses can be used to wash any dust, mud or debris off the wheels of vehicles before exiting the site.
 - e) Any mud/dust deposited off site will be treated as an emergency and cleaned by operatives using manual techniques or the operator will organise for a road sweeper to be deployed if required.
 - f) Any dust/fluff cleared from mobile plant or other areas where dust/fluff could idle will be deposited into one of various mobile wheelie bins which are located near the site office.
 - g) The operator will dampen down surfaces using a hose; paying special attention to the areas where dust/debris is likely to build-up i.e. where wastes with dust potential are

stored. These will be behind and on top of storage bays which are not readily accessible when operations are taking place.

- h) The operator will shut down plant/machinery and hose them down to remove any dust/fluff that may have accumulated beneath them.

4.5.2 It must be noted that the site is not likely to accept wastes that are considered to have the potential to be dusty (soil, stones and rubble) and have had no complaints from third parties or regulators regarding dust or tracking mud/debris off site.

4.6 Control Measures – site suppression

4.6.1 **Hosepipes** – There are hoses situated around the site which can be utilised to spray waste in bays and stockpiles, and for further dampening of the site surface. The hosepipes will be used daily if required to dampen down all wastes at the site to minimise the risk of dust being produced.

4.6.2 **Water storage tank** – There is an 15,000-litre water storage tank available on site which collects clean rainwater from the adjacent building roof. This tank will be utilised in dust suppression on site.

4.6.3 The above suppression techniques will not be in use continually but only during the following circumstances where site management will inform staff to implement them:

- a) If the weather has been dry for three days and waste stockpiles/surface are dry.
- b) During dry/warm conditions i.e. temperatures above 75°F.
- c) During weather conditions when winds reach 4 or above on the Beaufort Wind Scale.
- d) In the event of operational staff or site management are noticing dust plumes appearing on site or dust emanating off site from carrying out daily on/off site inspections.
- e) In the event the operator requires to load dusty waste which may cause airborne dust once being loaded.

4.7 Control Measures – For littering

4.7.1 As mentioned previously due to the waste types accepted at the site the dust generation isn't likely. However, litter generation is likely the site has a number of control measures already in place these include the following:

- Litter nets that are surrounding the site,
- A 2m in height wall located to the north of the site.
- Stockpiles of wastes likely to generate litter are held within 3 sided concrete bays
- Use of a Manitou on the site ensures that stockpiles are kept pushed into the bays to ensure they are not wind blown around the site.

4.7.2 In the unlikely event that the material is deposited on the public highway it will be treated as an emergency and will be cleared immediately by the operator using manual techniques (brush, hoses, litter picking) or if required a road sweeper will be organised by the site manager.

4.8 Control Measures – water supply

4.8.1 A permanent mains water supply is available on site to ensure that dust suppression can function effectively. Any external water pipes will be lagged to prevent frost damage during winter months and the operator will set up a notification alert system with the Met Office in the event of a drought or hot weather being imminent. This will enable the operator to source water in the short and long term and store additional tanks if required prior to a potential water ban.

4.9 Control Measures – processing of waste

4.9.1 **Baling-** All balers on the site are situated within the on site buildings shown on Drawing No. 3312/001/03. The concrete panelling of the building is 3.5m in height for both of the buildings both east and west. These bays provide containment for both litter and any dust generated.

4.10 Control Measures – storage of waste

- 4.10.1 The control measures implemented by site management to minimise the risk of litter mainly and the site provides measures for management of dust and debris emissions from the continuing storage of wastes and the loading/unloading of these include:
- a) Stockpiles will be sprayed with water during periods of dry/windy weather to prevent excessive drying and dust formation.
 - b) In the event of dust plumes on site, dust emanating off site, dry weather conditions or when winds reach 4 on the Beaufort Wind Scale, hoses will be used to dampen storage areas and stockpiles.
 - c) Drop heights will be kept to a minimum to prevent dust emissions where adjustment permits.
 - d) All waste which has undergone sorting/separation and are stored in dedicated bays will have a minimum 1m freeboard to prevent the waste exceeding the height of the bay and a 1m free board for the end of the bay in order to ensure all wind blown material is contained within the bay.
 - e) In the event of high winds outside of operational hours (the likelihood of which will be checked daily via Met Office notifications) stockpile heights of potentially litter generating wastes e.g., plastics, aluminium cans, paper and cardboard will be reduced by 1m and covered with tarpaulin to prevent wind whipping of material.
 - f) All waste stored within containers will not be overfilled so waste is overflowing beyond the confines of the container. In extremely windy conditions containers will have lids or tarpaulin placed over the top to secure the content of the containers.

4.11 Control Measures – vehicle movements and mobile plant

- 4.11.1 A no idling policy is in place which ensures that engines are switched off when vehicles or plant are not in use. This policy will ensure that tail pipe emissions are significantly reduced.
- 4.11.2 The site will follow the first in first out principle to reduce additional movements by mobile plant.

4.12 Control Measures - loading and unloading vehicles

- 4.12.1 The operator of the loading plant will direct vehicles to a position and location which reduces wind whipping of loaded material.
- 4.12.2 Drop heights will be kept to a minimum and tipped in a manner to ensure the pile does not exceed the 1m freeboard height of the bays / walls.

4.13 Control Measures - Process Monitoring

- 4.13.1 Process monitoring will be undertaken by site operatives to ensure procedures are being carried out effectively.
- 4.13.2 Following removal of waste from a bay a visual inspection of the bay will be undertaken to ensure all material has been removed before refilling. This ensures no residual material is left behind that could become dry and dusty from being stored for longer than required.
- 4.13.3 To ensure the site doesn't reach capacity and is unable to accept further waste loads, visual monitoring will be undertaken of storage bays and containers. If it is evident multiple bays or containers are full or near full and have not been emptied this indicates the site is nearing full capacity and the operator will arrange for waste to be removed or delay acceptance of loads until there is sufficient capacity available.

5 Dust Management Risk Assessment Model

5.1 Fundamental Considerations

- 5.1.1 **Source/Hazard:** A property or situation that in particular circumstances could lead to harm.
- 5.1.2 **Consequences:** The adverse effects or harm as the result of realising a hazard which causes the quality of human health or the environment to be impaired in the short or long term.
- 5.1.3 **Risk:** A combination of the probability of occurrence of a defined hazard and the magnitude of the consequences of the occurrence.

5.2 Pathway

- 5.2.1 Important in the assessment of a particular risk(s) and to inform the subsequent management of the risk(s) is the identification of the pathway(s) through which the risk may affect the identified receptor(s). The following are examples of pathways:

- Air
- Ground
- Water
- Direct contact / exposure

5.3 Consequences

- 5.3.1 Table 9 highlights the consequences of the hazard(s) identified and the abbreviations for each as used in the Risk Assessment Table 13 in Section 5.7.

Table 9 - Consequences

Abbreviation	Consequences
A	MINOR INJURY
B	MAJOR INJURY
C	DEATH
D	AIR POLLUTION
E	WATER POLLUTION
F	POLLUTION OF LAND

5.4 **Effects of consequences**

- 5.4.1 In order to quantify the level of risk and identify the appropriate management procedures, the potential effects must be considered, as outlined in Table 10 below:

Table 10 - Potential effects

Abbreviation	Effect of Consequences	Management Required?
S	SEVERE	In all cases
Mo	MODERATE	In most cases
Mi	MILD	Occasionally
N	NEGLIGIBLE	No

Note: "Management" is the action required to reduce the risk of a hazard causing a problem on site. Contingency measures are procedures which are in place to reduce the consequences of a hazard.

5.5 **Risk estimation and evaluation (probability/frequency of occurrence of hazard)**

- 5.5.1 Table 11 allows the likelihood of an occurrence of an identified risk to be assessed:

Table 11 - Likelihood

	Probability	Evaluation
1	Very likely	Could occur during any working day
2	Likely	Could occur regularly
3	Possible	Event possible
4	Unlikely	Event very unlikely

5.6 **Risk Assessment Outcome (combination of probability & consequence)**

- 5.6.1 Table 12 shows the resultant risk of an identified hazard or potential situation. This uses the hierarchy of both probability and consequence to assess the level of risk. The level of risk determines what level of management would be required in order to reduce the risk of occurrence and/or scale.

Table 12 - Risk assessment outcome

		Consequence			
		S	Mo	Mi	N
Probability	1	High	High	Medium	Low
	2	High	Medium	Low	Negligible
	3	Medium	Low	Negligible	N/A
	4	Low	Negligible	N/A	N/A

- 5.6.2 Where the risk assessment outcome is high, first-level management of the risk is essential, i.e. removal of hazard, implementation of major infrastructure/structural design measures to contain the risk/hazard and company policy changes to incorporate the management of the risk. All risk management measures must be supplemented with detailed induction training, spot training and tool-box talks to ensure all site staff and users are made fully aware of the risk/hazard, all potential consequences and necessary management and contingency procedures.
- 5.6.3 Where the risk assessment outcome is medium, the management of the risk should be tackled by management or delegates. If removal of the hazard is not possible, management will normally be met through implementing minor structural design measures or by imposing procedures for the prevention of occurrences which will be conveyed to all site staff through the appropriate training, including any contingency measures/procedures.
- 5.6.4 Where the risk assessment outcome is low, the management of the risk can be done wholly through appropriate training to site staff including any contingency measures/procedures.

- 5.6.5 Where the risk assessment outcome is negligible, site staff should be made aware of the possibility of an occurrence and contingency measures should be readily available to all staff should they be required.

5.7 Risk Assessment Table

- 5.7.1 The following pages contain the site-specific risk assessment for the site with appropriate remedial actions, recommendations and comments included for each identified hazard, potential contaminant, or situation.
- 5.7.2 Table 13 also contains references to the appropriate section(s) of the site's EMS for additional management procedures.
- 5.7.3 As discussed in the previous sections, all situations which identify a risk from Low –High should be incorporated into the staff/visitor training schedule, where appropriate and acted on as required.
- 5.7.4 As mentioned throughout this document due to the waste types accepted at the site dust emissions aren't likely to be an issue with regard to the waste on site however incoming and outgoing vehicles maybe a source of dust. Litter is the main emission likely to cause complaints from surrounding commercial/residential premisses. Table 10 overleaf therefore details the relevant pathways and receptors for each individual litter emission source and relevant measure required to break these linkages. The control measure outlined in Section 4 will be included within these Tables as well as additional specific measures.

SEE TABLES OVERLEAF

Table 13 - Source, Pathway, Receptor Routes

Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action & recommendation
Litter on site surfaces	Windblow litter/dust from vehicles	Local human population, including adjacent commercial / industrial units, other neighbouring businesses, residential dwellings and surface water features, specifically: • Site workers and visitors. • Adjacent commercial properties • Surface water features including Aller Brook, East • Residential dwellings on Forde Close.	Harm to human health – respiratory irritation and illness, mental health. Air Pollution Water Pollution	Moderate	3	Low	Site surfaces will be cleaned and monitored throughout the day. The operator will pay special attention to the areas where litter is likely to build-up i.e. near to treatment plant and stockpiles of potentially wind blown litter wastes. All site operatives will be trained in these procedures, and it will be the responsibility of site management to ensure the measures have been carried out. Daily housekeeping inspections are undertaken on site to collect and clear debris and litter to prevent it from leaving the permit boundary. Vehicle speed on site is restricted to 5mph. Signs are erected at the relevant areas of the site, including the main access gates, to advise drivers of the speed limit. This will reduce the re-suspension of dust and particulate matter. Exiting vehicles leaving the site will avoid all areas where wastes are stored or stockpiled. All vehicles will be checked before they leave the site to ensure no mud/dust can stretch beyond the site access. All incoming/outgoing vehicle loads will be sheeted. Vehicle wheels will be cleaned using an on-site hose pipe if required. Mud or debris deposited onto the public highway will be treated as an emergency and cleaned by site operatives. If required, the site manager will arrange for a road sweeper to be deployed on the public highway. Continuous monitoring regime in place to identify any potential for dust leaving site boundary.	Negligible

Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action & recommendation
Vehicles tipping into waste reception/storage areas	Air	As above	Harm to human health – respiratory irritation and illness, mental health. Air Pollution Water Pollution	Moderate	2	Medium	The main waste reception / tipping areas are situated within the waste transfer building and therefore any potential litter from the tipping of mixed loads would likely be contained within the confines of the building. If upon visual inspection wastes appear like they have the potential to be wind blow litter, prior to tipping of skips into designated bays the bay stockpile sizes will be managed to ensure that the tipping vehicle can reverse into the bay to ensure no litter escapes from the front of the bay. Drop heights and vehicle shaking to empty the waste will be minimised with drop heights kept to 1m-2m above the feed hoppers to be baled. The loading of waste into the dedicated balers is undertaken by the onsite Manitou vehicles which can deposit directly into the hoppers, with the hoppers located at the back of the onsite buildings to prevent the wind affecting any dropped waste. The operator will avoid double handling of waste. Staff continue to monitor the waste to ensure it does not escape the confines of storage bays and skips / containers. There is access to mains water, hoses and an 15,000-litre storage tank on site.	Low
Loading of waste into treatment plant	Air	As above	Harm to human health – respiratory irritation and illness, mental health. Air Pollution Water Pollution	Moderate	2	Medium	Drop heights will be kept to a minimum to prevent litter emissions which will be no more than 1m – 2m above the plant. The operator will avoid double handling of waste and may directly load from vehicle directly into the treatment plant if feasible. Suspension of operations during conditions where winds reach 7+ on the Beaufort Wind Scale, if wind-blown litter exits the site following on/off site inspections. The balers and bottle basher are situated within the on-site buildings which provide a degree of protection from winds and litter being blown while waste is deposited into the feed hoppers.	Low

Source(s)	Pathway	Receptor(s)	Consequences	Effect	Probability	Assessment Outcome	Remedial Action/ Recommendations/ Comments	Assessment Outcome following action & recommendation
Processing of waste as part of mechanical recycling facility comprising baling / bottle bashing etc	Air	As above	Harm to human health – respiratory irritation and illness, mental health. Air Pollution Water Pollution	Moderate	2	Medium	Operations will reduce or suspend if the site management detect noticing wind blown litter emanating off site from operations being undertaken on site. The storage area bays are located to ensure that vehicles leaving the site do not track through wastes. All potentially litter generating waste stored in bays will be stored with a 1m freeboard from the height of the bay/ front of the bay. The site undergoes continuous monitoring by operational staff who will continue to inspect and clean the site daily in addition to monitoring stockpile and freeboard heights.	Low
Prolonged periods of dry/warm weather or conditions where winds reach 4+ on the Beaufort Wind Scale	Air	As above	Harm to human health – respiratory irritation and illness. Air Pollution Water Pollution	Moderate	2	Medium	Additional (increased from one to three times) daily visual assessment / monitoring will be on and off site around the site perimeter in order to ensure dust/litter is not escaping beyond the site. Continual use of mobile dust suppression methods (hose pipes) until weather conditions change/improve or inspections detail dust emanating on/off site is not occurring. Continual monitoring of stockpile sizes in bays to ensure that any waste that has the potential to cause litter issues is contained within the bay and does not leave the front of the bay and therefore can be affected by high winds.	Low
Particulate emissions from the exhaust of vehicles / plant /generators and other non-road going machinery on site.	Air	As above	Harm to human health – respiratory irritation and illness. Air Pollution Water Pollution	Moderate	3	Low	All vehicles, plant and equipment are serviced in line with manufacturer recommendations to ensure they are fit for purpose and ensure emissions are below the acceptable level. All vehicles, plant and equipment undergo daily inspections under the site's preventative maintenance schedule to ensure no visible faults are detected. Ongoing inspections will note any faults with machinery and if a fault detected, the site/compliance manager or TCM will decommission the plant/vehicle until it is fit for purpose.	Very Low - Negligible

6 Monitoring and Contingency Measures

6.1 Monitoring and Recording

Visual Litter Monitoring

- 6.1.1 As mentioned previously due to the waste accepted on the site dust emissions are not likely to be present at the site. This being said the site will be monitored for litter by visual observation. There are no fixed locations for dust monitoring as this will change dependant on weather conditions and the direction of wind. Monitoring will take place anywhere within and around the site boundary. Monitoring results will be recorded on the dust emissions and litter emission form, see Appendix IV.
- 6.1.2 Litter monitoring will be carried out during operational hours. Recorded visual monitoring will be undertaken at least twice a day, for a minimum of five minutes each time by appropriately trained site operatives. Visual monitoring will take place at the beginning of the working day and when operations with the highest potential to produce litter are taking place. This is considered to be the most beneficial method to ensure that mitigation measures being implemented on site are effective. It is expected that staff members will also check for litter emissions as they approach or leave the site boundary.
- 6.1.3 If excessive emissions are observed, the site manager will establish what is causing the excessive litter emission to be generated and take remedial action.
- 6.1.4 If the operator increases suppression methods and the suppression methods are still not considered suitable, operations will reduce or cease until the problem has been fully rectified. Site management will be responsible for investigating litter issues and provide additional training to staff to prevent any re-occurrences.
- 6.1.5 Extra and unplanned monitoring will be carried out on site when conditions are particularly windy (4 or above on the Beaufort scale) or dry, new activities are being undertaken, new machinery is being used or following the receipt of a complaint or incident related to emissions.

- 6.1.6 Site operatives will continuously visually monitor emissions whilst plant is in operation and will control emissions using the procedures outlined in section 4 and asking the site manager, compliance manager, TCM or third party for advice as required. Work procedures will be stopped/adjusted should it be evident significant dust is being emitted which has the potential to migrate offsite.

6.2 Out-of-hours Monitoring

- 6.2.1 Due to the mitigation measures outlined in sections 4 it is not considered necessary to undertake recorded or in person visual monitoring outside of operational hours.
- 6.2.2 Senior management have remote access to CCTV footage on site via their mobile devices, if required (if excessively windy conditions are expected overnight such as winds exceeding 7 on the Beaufort wind scale) these can be periodically monitored out-of-hours.
- 6.2.3 As outlined in section 4.2.5 weather conditions will be checked at the start of each working day, if windy conditions are expected overnight stockpiles of material will be left low to reduce the likelihood of litter build up. If required, stockpiles will be covered with tarpaulin overnight.
- 6.2.4 For security purposes there is someone on site 24/7 including outside of operational hours. If excessive litter emissions are seen emitting offsite the security on duty will alert the out of hours contact. Out-of-hours security will be trained on dust suppression techniques so if instructed by the out-of-hours contact can administrate litter suppression via if required.

6.3 Staff Shortages / Human Error

- 6.3.1 In the event of unforeseen staff shortages arising from illness, suspension or no shows, the Operator will make a judgement whether to reduce the number of incoming loads, thus reducing processing frequency and divert material to an alternative site. The operator will then seek further employment within a timely manner to ensure the site can continue to operate at its required capacity.

- 6.3.2 All staff are trained and undergo toolbox talks every 12 months (or sooner if operations change) to reduce the impact of human error. In instances where a human error has caused to an on-site litter issue, the site may suspend operations until the issue has been rectified and the member of staff will be warned and re-trained accordingly.

6.4 Weather Conditions

- 6.4.1 The site will receive Met Office weather alerts for conditions which could cause a potential on or off-site litter complaint:
- a) Litter build up occurring on site, potentially if winds reach 4 on the Beaufort Wind Scale
 - b) Winds exceeding 7 on the Beaufort Wind Scale
 - c) Litter escaping beyond the site boundary.
- 6.4.2 The operator will install the following preventative measures on site to avoid serious dust pollution:

WINDS EXCEEDING 7 ON THE BEAUFORT WIND SCALE

- No sorting, processing or treatment of any wastes which are likely to be blown around during these wind conditions; operations would also be suspended where it is evident where litter is escaping beyond the site. Operations would only continue once the problem has been rectified i.e. by carrying out suppression or reducing stockpile heights or if weather conditions improve.
- Stockpiles will be reduced to further such as a 2m freeboard to prevent the material escaping beyond the site boundary.
- Stockpiles may be covered with tarpaulin in the event the above procedures are not considered effective.
- If higher winds i.e. amber/red alert on Met Office are present, the site will deploy the above measures and may be forced to close operations until conditions have improved.

DROUGHTS/WARM, DRY WEATHER

- In cases such as a hosepipe ban or water shortage, the site will ensure there is additional water available i.e. tanks, in addition to the permanent 15,000-litre water storage tank behind the waste transfer building, which can be used to ensure suppression techniques can still function. Tanks will include IBCs filled with water and a mobile water bowser to be utilised.
- The operator will contact the water company daily to see when water supply is available, operations would reduce in these instances.
- Where dust is becoming a major concern then the operator will stop processing the material and cover the piles using tarpaulin until conditions or dust suppression techniques are considered effective.

6.5 Operational/Power failure

- 6.5.1 The site manager will be contacted by staff in the event of any operational failure such as the breakdown of plant, systems or equipment and will decide whether operations are to continue or be suspended prior to corrective action being taken. Serious operational failures will be recorded in the site diary and operations suspended if litter is apparent.
- 6.5.2 All details of defects, problems and repairs carried out will be recorded on a daily inspection form. Detailed comments may also be recorded in the site diary. All repairs will be carried out as soon as practicable.
- 6.5.3 All repairs to site security will be made on the discovery of the damage and the site will be made secure until the repair has been carried out.
- 6.5.4 Any major defects found during site inspections which are likely to lead to a breach of permit conditions will be repaired by the end of the working day in which they are found, where possible. If a repair is not possible by the end of the working day and a potential breach of permit conditions may occur, the EA will be contacted to agree a suitable timescale for repair.
- 6.5.5 The operator would also be required to make a note of any unavoidable events plant/equipment malfunctions in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the Council/EA or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed to the cause of the complaint. If there are significant dust releases outside normal operations, the operator will cease operation, investigate, and resolve the issue before continuing.

7 Reporting and Complaints Response

7.1 Reporting of Complaints

7.1.1 Should a complaint regarding dust/litter be received by the site, the complaint will be recorded on the complaints form and investigated in accordance with the complaint's procedure. Details of information to be recorded as a minimum are:

- a) Who made the complaint.
- b) Date & time of the complaint.
- c) The nature of the complaint.
- d) Action taken.
- e) Signature.

7.1.2 The person completing the form will then, if possible, make a note of:

- a) the weather conditions at the time of the problem (rain snow fog etc.)
- b) strength and direction of the wind; and,
- c) the activities being undertaken at the time of the complaint, particularly anything unusual.

7.1.3 The site manager will identify what caused the excessive emissions to be generated. If the excessive dust emissions have been caused by a procedure not being carried out properly, then staff will receive further training on the dust procedures and this DEMP. If the excessive emission has been caused by plant failure, then the plant will be repaired as soon as possible.

7.1.4 All complaints will be acknowledged and investigated, with resultant actions reported to the complainant. Any complaints received by the Environment Agency relating to emissions from the site are dealt with on the same day.

7.1.5 If three or more complaints are received on the same working day, the TCM will escalate the complaint, review site operations taking place and commit to stop operations until the

cause has been identified. The known cause will not commence until the issue has resolved i.e. targeted suppression or plant malfunction and repair.

7.1.6 The operator would also be required to make a note of any unavoidable events plant/equipment malfunctions in the site diary, rather than just actual complaints received. This will ensure that if complaints are received retrospectively from either the Council/EA or directly, any circumstances which led to that complaint as a result of elements outside of the operator's control would be able to be attributed to the cause of the complaint.

7.1.7 If the source cannot be ascertained with 100% confidence, the site manager, compliance manager or TCM will either suspend or reduce the likely dust/particulate/litter generating activities.

7.1.8 The EA will be notified by email of any third-party complaints received by the end of the working day including the complainant and the outcome of the investigation. Where complaints are substantiated as causing or likely to cause significant pollution, then the EA will be notified without delay, as required by conditions in the EP.

7.2 Liaison with Neighbours

7.2.1 In the extreme event of significant but temporary litter releases outside normal operations, neighbours will be contacted to advise them of the situation and the action being taken. The EA will also be notified.

7.2.2 An open-door policy will be encouraged by the operator to enable any complaints from neighbouring premises (if received) to be dealt with immediately. The complainant will then be supplied with remedial actions taken and any procedures or measures put in place by the operator to reduce or ideally eradicate the likelihood of a subsequent complaint.

7.2.3 If any dust/litter complaints are received, the complaint will be assigned to an operative familiar with the sites operation who will complete the form in Appendix III which will be kept for inspection on request by the LA and/or EA. Details of information to be completed are dates, nature of complaint, weather conditions at the time of the complaint, investigation details, action taken and a signature (as a minimum). Emission (litter/dust)

complaints will be investigated and responded to within 24 hours and suitably reviewed by the site manager who is ultimately responsible.

Appendix I

Drawings

Appendix II

Inspection Checklist

TEIGNBRIDGE DISTRICT COUNCIL			
DAILY INSPECTION CHECKLIST			
DATE			
ITEM FOR VISUAL INSPECTION ↓	TIME OF INSPECTION (START)	CHECKED Y/N	REMEDIAL ACTION REQUIRED
	TIME OF INSPECTION (FINISH)		
EMERGENCY ACCESS (FREE FROM BLOCKAGES)			
COMBUSTIBLE WASTE STORAGE (AWAY FROM POTENTIAL IGNITION SOURCES)			
FIRE WATCH AT THE END OF THE WORKING DAY TO INSPECT FOR SIGNS OF SELF-HEATING, SMOKE OR FIRE AND ENSURE EXHUAISTS ON PLANT ARE COOL ETC			
DUST/FLUFF AROUND UNIT CHECK			
LITTER (I.E. LOOSE COMBUSTIBLE WASTE MATERIALS)			
PLANT/EQUIPMENT MAINTENANCE CHECKS (BEFORE AND AFTER USE)			
FIRE QUARANTINE AREA IS CLEAR OF WASTE			
DUST MONITORING			
OTHER (SEE NOTES BELOW)			
INSPECTION CARRIED OUT BY			
NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):			
CHECKED BY		SIGNATURE	
POSITION		DATE	
SHEET		OF	

TEIGNBRIDGE DISTRICT COUNCIL			
WEEKLY INSPECTION CHECKLIST			
WEEK COMMENCING			
ITEM FOR VISUAL INSPECTION ↓	TIME OF INSPECTION (START)	CHECKED Y/N	REMEDIAL ACTION REQUIRED
	TIME OF INSPECTION (FINISH)		
SITE SECURITY (CCTV SYSTEM IS WORKING, FENCING AROUND SITE PERIMETER IS IN GOOD CONDITION, LOCK ON GATED ENTRANCE IS WORKING)			
WASTE STORAGE AREA (NOT EXCEEDING THE DIMENSIONS INCLUDED IN THE FIRE PREVENTION PLAN)			
WEATHER FORECAST (CHECK FOR UPCOMING WEEK TO DETERMINE IF WASTE OPERATIONS ARE LIKELY TO BE IMPACTED)			
FIRE FIGHTING EQUIPMENT AND SPILL KITS E.G. FIRE EXTINGUISHERS ARE IN PLACE AND FULLY STOCKED			
INTEGRITY OF CONCRETE WALLS / BAYS (NO CRACKS ETC)			
INTEGRITY OF IMPERMEABLE PAD (NO CRACKS ETC)			
INTEGRITY OF WATER STORAGE TANK (NO LEAKS OR CRACKS ETC)			
INTERCEPTOR CAPACITY			
OTHER (SEE NOTES BELOW)			
INSPECTION CARRIED OUT BY			
NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):			
CHECKED BY		SIGNATURE	
POSITION		DATE	
Sheet		of	

TEIGNBRIDGE DISTRICT COUNCIL			
MONTHLY INSPECTION CHECKLIST			
WEEK COMMENCING			
ITEM FOR VISUAL INSPECTION ↓	TIME OF INSPECTION (START)	CHECKED Y/N	REMEDIAL ACTION REQUIRED
	TIME OF INSPECTION (FINISH)		
HOSES AVAILABLE ON SITE AND FREE FROM HOLES (IN GOOD WORKING CONDIITON)			
ELECTRICALS (WIRES SHOULD NOT BE FRAYED / DAMAGED AND SOCKETS NOT OVERLOADED)			
SPILL KITS / FIRE EXTINGUISHERS AVAILABLE AND FULLY STOCKED			
FIREWATER BOOMS AVAILABLE			
OTHER (SEE NOTES BELOW)			
INSPECTION CARRIED OUT BY			
NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):			
CHECKED BY		SIGNATURE	
POSITION		DATE	
Sheet		of	

Appendix III

Complaints Form

Complaints Report Form	
Date Recorded	Reference Number
Name and address of caller	
Telephone number of caller	
Time and Date of call	
Nature of complaint (noise, odour, dust, other) (date, time, duration)	
Weather at the time of complaint (rain, snow, fog, etc.)	
Wind (strength, direction)	
Any other complaints relating to this report	
Any other relevant information	
Potential reasons for complaint	
The operations being carried out on site at the time of the complaint	
Follow Up	
Actions taken	
Date of call back to complainant	
Summary of call back conversation	
Recommendations	
Change in procedures	
Changes to Written Management System	
Date changes implemented	
Form completed by	
Signed	
Date completed	

Appendix IV

Dust Monitoring Form

TEIGNBRIDGE DISTRICT COUNCIL DUST MONITORING FORM				
WEEK BEGINNING				
DAY/DATE/TIME OF INSPECTION				
SHEET 1 OF	COMMENTS BELOW (AS MUCH DETAIL AS POSSIBLE); IF COMMENT IS NO – ADD FURTHER COMMENTS			
DAILY RECORDING INFORMATION	DUST MONITORING POINT 1	DUST MONITORING POINT 2	DUST MONITORING POINT 3	OTHER AREA OF SITE - SPECIFY
WEATHER CONDITIONS				
WEATHER TEMPERATURE				
WIND SPEED				
WIND DIRECTION				
PERIMETER INFRASTRUCTURE SUITABLE				
WATER JET SYSTEM FUNCTIONING				
ARE WASTE STORAGE STOCKPILES BELOW 5m				
DUSTY MATERIAL STORAGE VISIBLE FROM LOCATION				
ANY NOTICEABLE DUST / PARTICULATES ON THE GROUND NEAR THE LOCATION				
ANY DUST APPARENT OFF SITE				
EMISSIONS FROM PLANT/EQUIPMENT VISIBLE				
SMOKE FROM PLANT APPEAR TO BE SUITABLE				
HAS SITE MANAGEMENT BEEN INFORMED OF THE INSPECTION				
DOES ACTION NEED TO BE TAKEN				
INSPECTION CARRIED OUT BY				
OTHER				
NOTES/ACTION (CONTINUE ON A SEPARATE SHEET IF NECESSARY):				
CHECKED BY		SIGNATURE		
POSITION		DATE		